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17 **UNITED DISTRICT COURT**

18 **DISTRICT OF NEVADA**

19 HOUSTON CASUALTY COMPANY, a
20 foreign corporation,

21 Plaintiff,

22 v.

23 FINDLAY MANAGEMENT GROUP, a
24 Nevada domestic corporation,

25 Defendant.

26 Case No. 2:24-cv-01459-GMN-NJK

27 **STIPULATION AND [PROPOSED]
28 ORDER TO EXTEND TIME FOR
DEFENDANT TO RESPOND TO
AMENDED COMPLAINT [ECF NO. 5]
(FIRST REQUEST)**

29 Pursuant to LR IA 6-1, Plaintiff Houston Casualty Company, on one hand, and Defendant
30 Findlay Management Group, on the other hand, by and through their respective undersigned
31 attorneys of record (collectively, the “Parties”), hereby stipulate and agree subject to the Court’s
32 approval to extend time for Defendant to respond to the Amended Complaint (ECF No. 5). The
33 current deadline is September 24, 2024. This is the first request for extension concerning this
34 deadline.

35 1. On August 9, 2024, Plaintiff filed its Complaint (ECF No. 1) against Defendant, which was
36 not served on Defendant.

- 1 2. On August 28, 2024, Plaintiff filed its Amended Complaint (ECF No. 5) against Defendant.
- 2 3. On September 3, 2024, Defendant was served with Plaintiff's Amended Complaint (ECF
- 3 No. 5) and the Summons (ECF No. 12).
- 4 4. The current deadline for Defendant to respond to the Amended Complaint (ECF No. 5) is
- 5 September 24, 2024.
- 6 5. Subject to the Court's approval, the Parties have agreed that Defendant shall have an
- 7 additional thirty (30) days to respond to the Amended Complaint (ECF No. 5). Defendant
- 8 waives any service of process and personal jurisdiction defects and agrees not to contest
- 9 those issues in this case via motion or otherwise.
- 10 6. The requested extension of thirty (30) days is based on the complexity of issues raised in
- 11 this case, which primarily revolve around whether insurance coverage exists for a
- 12 ransomware attack on Defendant's computer network. (*See* ECF No. 5 at ¶¶ 1, 8.) An
- 13 additional thirty (30) days will allow Defendant's outside counsel sufficient time to get up
- 14 to speed. The additional thirty (30) days is also necessary to accommodate scheduling
- 15 conflicts of Defendant's counsel that are presented by other matters and commitments that
- 16 existed before this case was filed.

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